

FILED IN OPEN COURT

DATE: 2/27/06

TIME: 11:12 am

INITIALS: JK

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Criminal No. <u>05-20047-B</u>
)	<u>05-200268</u>
CHARLES FRANKLIN GRUBB,)	
)	
Defendant,)	

PLEA AGREEMENT

The United States Attorney's Office for the Western District of Tennessee, the defendant, CHARLES FRANKLIN GRUBB, and the attorney for the defendant, BILL ANDERSON have reached an agreement that contemplates the entry of a plea of guilty by the defendant in this case.

The full and complete plea is as follows:

1. CHARLES FRANKLIN GRUBB agrees that he will enter a voluntary plea of guilty to both indictments listed above.
2. In exchange for CHARLES FRANKLIN GRUBB's guilty plea and his complete fulfillment of all obligations under this agreement, the United States Attorney agrees except for not to further prosecute CHARLES FRANKLIN GRUBB for violations in the Western District of Tennessee where International

Paper or one of its subsidiaries is the victim. CHARLES FRANKLIN GRUBB UNDERSTAND AND AGREES THAT THE United States Attorney is free to prosecute him for any other unlawful past conduct or any illegal conduct that occurs after the date of this agreement. This non-prosecution agreement does not bind any other federal, state, or local agency.

3. Given the facts in the possession of the United States at the time of the writing of this agreement, the United States does not oppose the defendant receiving acceptance of responsibility credit pursuant to U.S.S.G. Section 3E1.1. The defendant understands that if the United States receives information between the signing of this agreement and the time of the sentencing that the defendant has previously engaged in, or if he engages in the future, in conduct inconsistent with the acceptance of responsibility, including, but not limited to, participation in any additional criminal activities between now and the time of sentencing, this position could change. Further, the defendant understands that whether or not acceptance of responsibility credit pursuant to Section 3E1.1 is granted and to the extent of which it is granted is a matter to be determined by the district court. Failure of the district court to grant acceptance of responsibility credit is not a basis for Charles Franklin Grubb to withdraw his guilty plea.

Charles Franklin Grubb 2/27/06
CHARLES FRANKLIN GRUBB Date
Defendant

Bill Anderson 2/27/06
BILL ANDERSON Date
Attorney for CHARLES FRANKLIN GRUBB

Stephen C. Parker 2-27-06
STEPHEN C. PARKER Date
Assistant United States Attorney
800 Federal Building
Memphis, TN 38103